## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

MIRAMAR FIREFIGHTERS' PENSION FUND, on behalf of itself and all others similarly situated,

Plaintiff,

v.

IROBOT CORPORATION, COLIN M. ANGLE, and ALISON DEAN,

Defendants.

JEROME CAMPBELL, on behalf of itself and all others similarly situated,

Plaintiff,

v.

IROBOT CORPORATION, COLIN M. ANGLE, and ALISON DEAN,

Defendants.

No. 1:19-cv-12536-DJC

Judge Denise J. Casper

**CLASS ACTION** 

ORAL ARGUMENT REQUESTED

No. 1:19-cv-12483-DJC

DECLARATION OF GUILLAUME BUELL IN SUPPORT OF THE MOTION OF CARPENTERS ANNUITY TRUST FUND FOR NORTHERN CALIFORNIA AND CARPENTERS PENSION TRUST FUND FOR NORTHERN CALIFORNIA FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL

I, GUILLAUME BUELL declare on this 23rd day of December, 2019:

- 1. I am Of Counsel with the law firm of Thornton Law Firm LLP ("Thornton Law"), Liaison Counsel for Carpenters Annuity Trust Fund for Northern California and Carpenters Pension Trust Fund for Northern California ("Northern California Carpenters"). I submit this declaration in support of Northern California Carpenters' motion to consolidate the above-captioned securities class actions, for appointment as Lead Plaintiff, and approval of its selection of Lead Counsel for the Class.
- 2. Attached hereto as Exhibit A is a true and correct copy of Northern California Carpenters' signed certification, pursuant to the requirements of the Private Securities Litigation Reform Act of 1995 (the "PSLRA"). 15 U.S.C. § 78u-4(a)(2).
- 3. Attached hereto as Exhibit B is a chart reflecting the calculation of Northern California Carpenters' financial loss in iRobot Corporation securities purchased during the Class Period.
- 4. Attached hereto as Exhibit C is a true and correct copy of the notice that was published October 24, 2019 by the first plaintiff to file a complaint subject to the PSLRA on *PR Newswire*, a widely-circulated, national, business-oriented wire service, advising the public of the pendency of the action brought on behalf of investors in iRobot securities.
- 5. Attached hereto as Exhibit D is a true and correct copy of the firm resume of Labaton Sucharow LLP.
- 6. Attached hereto as Exhibit E is a true and correct copy of the firm resume of Thornton Law.

I hereby declare under penalty of perjury that the foregoing is true and correct.

/s/ Guillaume Buell
Guillaume Buell

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## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed through the ECF system on December 23, 2019 and accordingly will be served electronically upon all registered participants identified on the Notice of Electronic Filing.

/s/ Guillaume Buell
Guillaume Buell (BBO# 676566)